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POSTAL RATE COMMISSION
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**SMARTMAIL, INC. INTERROGATORIES
TO USPS WITNESS MOELLER
(SMARTMAIL/USPS-T36-1&2)
(September 17, 1997)**

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Smartmail, Inc. hereby submits these interrogatories and requests for production of documents. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person. If data requested are not available in the exact format or level of detail requested, any data available in a substantially similar format or level of detail or susceptible to being converted to the *requested format and detail should be provided.*

SMARTMAIL\USPS-T36-1.

Assume that a national retail stock brokerage firm sent by First-Class mail monthly statements of activity to each of its individual customers. Further assume that such firm also wants to send to its sales agents a copy of such statements which were sent to each of such sales agents' customers. Further assume that it is not economical for such firm to

send the copies of such statements to its sales agents by First-Class mail, but that it would be economical for such firm to send such copies to its sales agents by Standard mail.

Would it not benefit the Postal Service financially if the firm in the above example sent such copies to its sales agents by Standard mail, rather than to send such copies outside of the U.S. mail system by means such as the Internet?

SMARTMAIL\USPS-T36-2.

Assume that the Domestic Mail Classification Schedule were amended by adding the following sentence to the end of Section 312 ("Printed Matter"):

"Printed matter also includes photocopies or duplicate printed copies of bills, statements of account or other personal correspondence, which photocopies or duplicate printed copies are sent not to the original addressee listed on such photocopies or duplicate printed copies, but rather to a third party with a business purpose and right to receive a copy of such information."

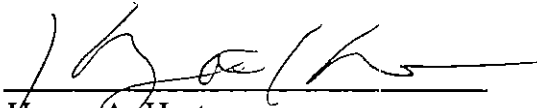
a. Do you believe it more likely than not that such a modification would add to the revenue of the USPS by attracting some mail as Standard mail which would not otherwise be sent through the U.S. mail system?

b. Do you have any reason to believe that mail sent under such an amended DMCS provision would be more expensive for the USPS to accept, process and deliver than would other Printed Matter sent under the current version of Section 312 of the Domestic Mail Classification Schedule?

Respectfully submitted,

SMARTMAIL, INC.
Through Its Counsel

HAZEL & THOMAS, P.C.

By: 
Henry A. Hart

Date: September 17, 1997
Alexandria, Virginia

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

September 17, 1997

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